

February 8, 2016

The Bureau of Land Management New Mexico Office  
P.O. Box 27115  
Santa Fe, NM 87502-0115

RECEIVED  
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STATE OF  
SANTA FE, NEW MEXICO

Re: 10-year mineral rights lease of 258.9-acre collection of parcels underlying western arm of Lewisville Lake in Hickory Creek branch.

**I am writing to protest the lease of mineral rights at Lewisville Lake Dam.** I am homeowner in Irving, Texas. Irving is a suburb of Dallas and directly downstream from the Lewisville Lake Dam.

Part of the Lewisville Lake Dam was originally built in 1927 (Lake Dallas) then the U.S. Army Corps of Engineers enlarged it in 1948. In 2005, the Lewisville Lake Dam was identified as very high risk because of confirmed and unconfirmed potential safety issues, as well as potential impacts of those issues on the large downstream populations that may be affected. The dam is located 22 miles northwest of the City of Dallas. The Lewisville Lake Dam was listed among the top civil works projects for the Corps' Southwestern Division for fiscal year 2013. The dam was considered to require "major maintenance."

Despite this identified need, repairs were not immediately implemented and after torrential rains impacted the DFW area last year, a 161-foot long, 23-foot wide embankment slide occurred along with sand boils indicating that increasing seepage had created a passage under the base of the dam. If not stopped, it could lead to a rupture of the dam.

On December 12, 2015 I first became aware of this potential hazard when the Dallas Morning News published an article stating the Lewisville Lake Dam (LLD) was in disrepair and one of the nation's most dangerous. The Army Corp of Engineers had determined a breach could put 431,000 people in harm's way. Jason Vazquez, the Lewisville Dam safety program manager for the Army Corps of Engineers described what would happen should a breach occur:

*"With a full reservoir behind it, a 65-foot-tall flood wave traveling 34 mph would quickly inundate a wide swath of Lewisville, Coppell, Carrollton, Farmers Branch, Irving, Las Colinas and other communities bordering the Trinity River.*

*The wave would sweep everything in its path — the Lewisville dump, water treatment plants, LBJ Freeway, the Bush Turnpike, Interstate 35E, the State Highway 121 Tollway, Love Field, the Hospital District, office complexes, senior citizen centers, shelters, schools, playgrounds and 53,000 other structures.*

*Like a tsunami, the wave would submerge downtown Dallas in roughly 50 feet of water, the Corps estimates, causing more than \$21 billion in property damage, before continuing south down the Trinity River toward the Gulf of Mexico. "It would be a much bigger magnitude to the Dallas area than Hurricane Katrina was to New Orleans," says Vazquez. "It's a nightmare scenario."*

<http://interactives.dallasnews.com/2015/lewisville-dam/>

On January 15, 2016 Bristol General Contractors began work on \$6.4 million in repairs to the LLD. The project is scheduled for completion in late spring or early summer of 2016. All of us in the DFW area were

getting ready to breathe a sigh of relief, when we discovered that the Bureau of Land Management was considering leasing parts of the Louisville Lake Dam for hydraulic fracturing. PLEASE DO NOT lease BLM land for fracking near dams!!!

Hydrofracturing a dam is unsafe. According to Anita Branch, P.E., Senior Geotechnical Engineer Dam Safety Production Center in Tulsa, there are many negative implications including: induced seismicity, erosion of embankment in contact with faults could trigger failure, & there is potential for contamination of ground and surface water. Brach stated Dams are often many miles long with lots of different geology over those footprints. Mitigation for fracking impacts are not incorporated into the project design and projects are only as strong as their weakest link. A reservoir's water applies great pressure to the earth but in a uniform load. Fracking changes the stress state of the existing geology and applies high pressure in small areas. Because of this, Fracking could weaken dam foundations, trigger earthquakes, and/or cause dam failure.

[http://www.astm.org/COMMIT/images/6C\\_Branch\\_2013-01-29\\_ASTM.pdf](http://www.astm.org/COMMIT/images/6C_Branch_2013-01-29_ASTM.pdf)

<http://www.dallasnews.com/news/community-news/grand-prairie/headlines/20110731-corps-worries-that-fracking-gas-wells-might-hurt-dams.ece>

Lastly, since the Lake Lewisville Dam serves as the primary drinking water reservoir for Dallas and much of North Texas, I believe we should do everything in our power to protect this water resource. If fracking is allowed here, there is a potential for contamination of Lake Lewisville by toxic chemicals used in the drilling and hydraulic fracturing processes. This would render Lake Lewisville water undrinkable with considerable negative consequences for the entire of the Northwestern Texas region.

As a homeowner in the direct path of this dam should a breach occur, I am imploring you not to lease any lands for hydraulic fracturing near dams. There is no reason Dallas residents should be placed in harm's way. There are plenty of other areas away from dams in the U.S. that Oil and Gas interests can lease.

Respectfully,



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